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**DHW - Division of Environmental
Water Quality Bureau**

May 19, 1988

Katie Sewell, Compliance Section Manager
Idaho Division of Environmental Quality
Bureau of Hazardous Materials
450 West State Street
Boise, ID 83720

Dear Ms. Sewell:

I would like to take a moment of your time to respond briefly to the April 27, 1988 memo in which Rich Reed provided comments on the Westpark Environmental Assessment II (Assessment). I would also like to express some minor concerns regarding those comments.

From various conversations we have had with Idaho Division of Environmental Quality (Division) employees that have been assigned the task of reviewing the Assessment, it is clear that there have been some misconceptions concerning the original intent and focus of the Assessment. As you will recall from our April 12, 1988 meeting, this work was initially conducted on behalf of Pacific Rim Development Corporation (PRDC), a California development firm. The project was to involve a very general engineering and environmental assessment of property in which PRDC had a development interest. The assessment and subsequent report was developed primarily to satisfy PRDC's lenders that there were no problems at the site.

At PRDC's request, the assessment was to include a geophysical evaluation of the site (primarily to determine load bearing characteristics and soil percolation rates), a thorough review of previous land use and ownership, and the collection and analysis of three soil and three groundwater samples (the latter to include drilling and installation of three wells). PRDC also stated that it was imperative that they receive a copy of the assessment report, complete with engineering data and laboratory results, within one week. The client was informed by SRM that the time frame imposed upon the project would preclude the installation and development of monitoring wells that would conform to standard EPA protocol for monitoring well construction. With a quick, one time assessment of water quality the primary goal, PRDC was interested in the drilling and installation of wells that could yield groundwater samples in the shortest time possible.

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Once it became known that a potential water quality problem did exist, PRDC was anxious to determine the extent of the problem as quickly as possible (time was becoming a critical factor in PRDC's plans to develop the site since one of the major potential tenants required a firm commitment to a development date). The additional wells, installed to provide further data on the extent of the contaminant problem, were again constructed with the goal of obtaining water samples as quickly as possible (despite the push for rapid well construction, all wells were installed in strict compliance with the Idaho Well Construction Standards and in accordance with accepted EPA protocol).

By the time the second assessment was completed, PRDC had dropped plans to develop the site. From the start, SRM recognized that the assessment conducted for PRDC did not provide the scope or extensive detail that might be required to fully characterize a regulated hazardous waste site (which this does not appear to be). Despite these shortcomings, it appears that sufficient contaminant data is available to assist the property owner, Westpark Partnership, in the development and implementation of a groundwater remediation plan.

So much for background.

In regards to Mr. Reed's draft comments, I'm sure that once they are developed in final form there will be many items we will all wish to discuss. In the meantime, I am concerned about how some of Mr. Reed's comments reflect upon the quality of work conducted by SRM. The specific client needs and the funds dedicated to the site characterization portion of the proposed development project were limiting factors in this assessment. Needless to say, had the client's requirements been different (e.g. assessment for compliance and/or permitting reasons) and sufficient funds made available, the assessment conducted by SRM would have had the detail necessary to satisfy all parties.

Some of the additional information Mr. Reed felt was necessary as part of an overall site assessment was included in the original soil exploration and geophysical report. Mr. Reed has since been furnished with a copy of this report.

Item 6. (c) of the April 27 memo indicates that the drilling and sampling methods utilized were not appropriate for characterization and plume analysis. In context, this is somewhat misleading. Mr. Reed has since informed us that this comment was directed primarily at the lack of split spoon sampling during well drilling and was not intended to indicate that overall drilling and sampling methodology was inappropriate.

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Mr. Reed suggests, and we concur, that split spoon sampling would have provided additional site characterization information. Sufficient data had been collected to suggest that we were dealing with a fairly simple aquifer composed of alluvial sands and gravel. The lack of detailed lithologic logs for each well at the site does not negate the results of the groundwater sampling.

Item 6. (e) suggests that the Idaho Well Construction Standards appear to have been violated in constructing some of the wells. Further discussions with Mr. Reed have clarified this matter. There was evidently some confusion in interpreting a portion of the information supplied with the Assessment. All wells have been sealed in accordance with the Standards.

Item 6. (f), regarding bentonite vs. cement seals, involves what is often a judgement call on the part of the driller based upon knowledge of the local hydrology.

As mentioned previously, I'm sure that there will be many items we will all wish to discuss once comments from all reviewers are issued in final form. In the interim, I hope that you will acquaint anyone who might be reviewing the Assessment with the comments I have made.

Thanks for all your assistance.

Sincerely,
SPECIAL RESOURCE MANAGEMENT



Patrick W. Stoll
Idaho Branch Manager

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